

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

STATE OF TEXAS, et al.,

Defendants.

NO. 5:21-cv-844-XR

---

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

JOHN SCOTT, et al.,

Defendants.

NO. 1:21-cv-780-XR

---

HOUSTON AREA URBAN LEAGUE, et al.

Plaintiffs,

vs.

GREGORY WAYNE ABBOTT, et al.

Defendants.

NO. 5:21-cv-848-XR

---

LULAC TEXAS, et al.

Plaintiffs,

vs.

JOHN SCOTT, et al.

Defendants.

NO. 1:21-cv-786-XR

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

NO. 5:21-cv-0920-XR

GREG ABBOTT, et al.

Defendants.

**HAUL AND MFV PLAINTIFFS' ADDENDUM TO THE JOINT PRETRIAL ORDER**

Pursuant to this Court's March 30, 2023 Scheduling Order (Dkt. 579) and the Court's instructions during the August 22, 2023 status conference, HAUL Plaintiffs and MFV Plaintiffs ("Plaintiffs") respectfully submit a list of exhibits expected to be offered, reflecting whether a particular exhibit is objected to (Exhibit A) and a trial outline listing the witnesses and exhibits that support their claims (Exhibit B). Exhibit A includes four exhibits that were produced during discovery but were inadvertently omitted from Plaintiffs' Rule 26(a)(3) disclosures. Plaintiffs reserve the right to introduce any exhibit that appears on any other party's exhibit list at trial and to rely on any other witness or exhibit in support of their claims based on the evidence presented at trial.

Dated: September 5, 2023

/s/ Courtney Hostetler

Courtney Hostetler\*

Ron Fein\*

John Bonifaz\*

Ben Clements\*

FREE SPEECH FOR THE PEOPLE

1320 Centre Street, Suite 405

Newton, MA 02459

(617) 249-3015

chostetler@freespeechforpeople.org

rfein@freespeechforpeople.org

jbonifaz@freespeechforpeople.org

bclements@freespeechforpeople.org

Wendy Olson\*

Elijah Watkins\*

Mark Bieter\*

STOEL RIVES LLP

101 S. Capital Boulevard, Suite 1900

Boise, ID 83702

Telephone: (208) 389-9000

wendy.olson@stoel.com

elijah.watkins@stoel.com

mark.bieter@stoel.com

Bradley Prowant\*

John Katuska\*

STOEL RIVES LLP

33 S. Sixth Street, Suite 4200

Minneapolis, MN 55402

Telephone: (612) 373-8800

bradley.prowant@stoel.com

john.katuska@stoel.com

Laura Rosenbaum\*

STOEL RIVES LLP

760 SW Ninth Ave., Suite 3000

Portland, OR 97205

Telephone: (503) 224-3380

laura.rosenbaum@stoel.com

Respectfully Submitted,

/s/ Jennifer A. Holmes

Jennifer A. Holmes\*

NAACP LEGAL DEFENSE AND

EDUCATIONAL FUND, INC.

700 14th Street NW, Suite 600

Washington, DC 20005

Telephone: (202) 682-1300

Facsimile: (202) 682-1312

jholmes@naacpldf.org

Amir Badat\*

Victor Genecin\*

Breanna Williams\*

NAACP LEGAL DEFENSE AND

EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Telephone: (212) 965-2200

Facsimile: (212) 226-7592

abadat@naacpldf.org

vgenecin@naacpldf.org

bwilliams@naacpldf.org

Shira Wakschlag\*

THE ARC OF THE UNITED STATES, INC.

1825 K Street, NW, Suite 1200

Washington, DC 20006

Telephone: (202) 534-3708

Facsimile: (202) 534-3731

Wakschlag@thearc.org

Kenneth E. Broughton

Texas Bar No. 03087250

REED SMITH LLP

811 Main Street, Suite 1700

Houston, TX 77002-6110

Telephone: (713) 469-3800

Facsimile: (713) 469-3899

kbroughton@reedsmith.com

kpippin@reedsmith.com

Sean Lyons  
Clem Lyons  
LYONS & LYONS, P.C.  
237 W. Travis Street, Suite 100  
San Antonio, TX 78205  
Telephone: (210) 225-5251  
sean@lyonsandlyons.com

*\*Admitted pro hac vice*

*Counsel for Plaintiffs Mi Familia  
Vota, Marla López, Marlon López, and  
Paul Rutledge (“MFV Plaintiffs”)*

Sarah Cummings Stewart  
Texas Bar No. 24094609  
REED SMITH LLP  
2850 N. Harwood Street, Suite 1500  
Dallas, TX 75201  
Telephone: (469) 680-4200  
Facsimile: (469) 680-4299  
sarah.stewart@reedsmith.com

J. Michael Showalter\*  
ARENTFOX SCHIFF LLP  
South Wacker Drive, Suite 7100  
Chicago, IL 60606  
Tel: (312) 258-5561  
j.michael.showalter@afslaw.com

*\*Admitted pro hac vice*

*Counsel for Plaintiffs Houston Area Urban  
League; Delta Sigma Theta Sorority, Inc.;  
The Arc of Texas; and Jeffrey Lamar  
Clemmons (“HAUL Plaintiffs”)*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on September 5, 2023 upon all counsel of record by CM/ECF.

*s/ Jennifer A. Holmes*

Jennifer A. Holmes